

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA**

Roger A. Herndon, on behalf of himself and all  
others similarly situated,

Plaintiff,

vs.

Huntington Ingalls Industries, Inc., the HII  
Administrative Committee, and John/Jane Does 1–5,

Defendants.

Civil Action No.: 4:19-cv-00052-RCY-  
LRL

CLASS ACTION

**PLAINTIFF’S MOTION FOR FINAL APPROVAL OF CLASS SETTLEMENT**

Plaintiff Roger A. Herndon, individually and as representative of the Class, moves the Court under Federal Rule of Civil Procedure 23 for an Order finally approving a class action Settlement Agreement between Plaintiff and Defendants. Through this Motion, Plaintiff asks the Court to: (i) grant final approval of the Settlement; (ii) find that notice to the Class satisfied due process; and (iii) enter an order of final judgment and dismissal with prejudice of this action. A [Proposed] Final Order and Judgment is filed herewith.

In support of this Motion, Plaintiff submits the accompanying Memorandum of Law and the Declaration of Douglas P. Needham with an attached exhibit.

Dated: March 25, 2022

Respectfully submitted,

/s/ Gregory Y. Porter

Gregory Y. Porter (VSB # 40408)

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**CERTIFICATE OF SERVICE**

I certify that on March 25, 2022, the foregoing was served through this Court's CM/ECF system. I understand that notice of this filing will be sent to all parties by operation of the Court's electronic filing system.

/s/ Gregory Y. Porter  
Gregory Y. Porter (VSB # 40408)